

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: AMANDA A. ANGARITA : CHAPTER 13
:
:
DEBTOR : 15-10693

DEBTOR'S FIRST AMENDED CHAPTER 13 PLAN PRE-CONFIRMATION

1. The future earnings of the debtor are submitted to the supervision and control of the Trustee and the Debtor, **AMANDA A. ANGARITA**, shall pay to the trustee the total sum of **\$56,619.40**, of which the sum of **\$23,990.41** has been paid during the 1st through 19th months of the Plan, and the balance of **\$32,628.99**, is due and payable in monthly installments of **\$795.83**, for the 20th through 59th months of the plan, with one (1) final payment of **\$795.79**.

The Plan's applicable commitment period is five (5) years.

2. From the payments so received, the Trustee shall make disbursements as follows:

Frederick L. Reigle, Esquire, Standing Chapter 13 Trustee in the amount as set forth by the United States Trustee's Office.

a) Administrative Expenses:

1) All administrative expenses as follows:

Thomas L. Lightner, Esq.-Attorney Fees \$2,000.00
(Additional fees of \$1,000 for adversary
Action & approval of mortgage modification)

b) Priority Claims as follows:

Pennsylvania Dept of Revenue \$13.00
(Claim No. 1-2 Amended)

c) ARREARS on Secured Claims as follows:

Nationstar Mortgage, LLC \$ 0.00
Mortgage Arrears 701-705 Atlantic St.
(Claim No. 2-2 Amended)

Debtor has entered into a trial payment, and if successfully completed in 11/2016, a permanent modification will be offered.

BSI Financial Services, Inc. **\$7,926.09**
Mortgage Arrears on 407-409 Vine St.
(Claim No. 5-2 Amended)

Bayview Loan Servicing: **\$4,318.37**
Mortgage arrears on 857 Willow Rd.

d) The total secured balance due on secured claims including the applicable interest, late fees and costs as follows: n/a

Bank of America holds a second mortgage on Debtor's real property located at 857 Willow Road, Hellertown, PA 18055 with estimated claim that exceeds the value of the Debtor's property after deduction of the first mortgage balance. Debtor has filed a Motion to Determine Secured Status against Bank of America. If successful, the claim of Bank of America will be deemed fully unsecured.

e) Non-exempt equity in the property located at **407-409 Vine Street** in the sum of **\$36,700.00**, shall be paid into the plan for the benefit of unsecured creditors.

f) After all secured and priority claims have been paid, all allowed unsecured claims shall receive a pro-rata share of the distribution.

3. The following executory contracts of the Debtor are rejected:

N/A

4. Unless otherwise stated in this Plan, Debtor shall continue and/or resume making normal monthly payments to the following creditors outside the Plan as follows:

Commence/continue normal monthly payments outside the Plan to:

- a. Bay View - 1st Mortgage
(Property: 857 Willow Road)
- b. BSI Financial - 1st Mortgage
(Property: 407-409 Vine Street)
- c. Nationstar Mortgage Co. - 1st Mortgage
(Property: 701-705 Atlantic Street)

5. Debtor exercise her right to avoid all liens as allowed by law under 11 U.S.C. Section 522(f).
6. Title to the Debtor's property shall revert in the Debtor on confirmation of plan - upon dismissal of the case after confirmation pursuant to 11 U.S.C. Section 350.

Dated: 9/30/2016

/s/Amanda A. Angarita
Amanda A. Angarita

Acceptances may be mailed to:

Lightner Law Offices, P.C.
4652 Hamilton Boulevard
Allentown, PA 18103

PAYMENTS TO THE STANDING CHAPTER 13 TRUSTEE
SHOULD BE MADE PAYABLE AND MAILED AS FOLLOWS:

Frederick L. Reigle, Trustee
P.O. Box 680
Memphis, TN 38101-0680